

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) Case No. 19-03103-01-CR-S-SRB  
                                )  
JULIA M. LAWRENCE,        )  
                                )  
Defendant.                 )

**DEFENDANT'S MOTION FOR TEMPORARY RELEASE TO  
ATTEND GRANDFATHER'S FUNERAL**

COMES NOW, Julia Lawrence, by counsel and hereby respectfully requests the Court to release her into her mother's custody to attend her maternal grandfather's funeral on Saturday, August 22, 2020.

**SUPPORTING SUGGESTIONS**

1. Ms. Lawrence is currently incarcerated in the Greene County Jail. She was charged by indictment filed on August 20, 2019, with a single count of possession with intent to distribute 50 grams or more of methamphetamine.
2. Ms. Lawrence has been in custody since her arrest on August 21, 2019, and detained without bond pursuant to the Order of Detention on September 3, 2019.
3. Defendant's maternal grandfather passed away suddenly just three days ago on August 15, 2020. Defendant, having been very close to him, wishes the Court to allow her to be able to attend his funeral on Saturday, August 22, 2020. The funeral is scheduled to begin at 11:00 a.m.
4. The funeral is to be held at the Lohmeyer Funeral Home, which is located at 500 East Walnut here in Springfield.
5. Julia's mother seeks to pick Julia up on Saturday at 9:00 a.m. so that she can

dress for the funeral and have some time to spend with her family during this time of mourning.

6. Counsel has spoken with Julia and readily sees her desperate need to be able to be there for the funeral. She is deeply saddened by the prospect of not being able to see her grandfather off. Indeed, the loss is greatly magnified by her inability to be there with her family to mourn his loss.
7. Defendant's mother, Kelly Mandl, seeks to be able to pick up Julia from the jail Saturday at 9:00 a.m. and return her to the jail by 5:00 p.m. on Saturday.
8. Julia recognizes her request may seem questionable to the court, but her need to simply be with her family when goodbyes are said to her grandfather is monumental. Indeed, Julia's not being able to be there will be devastating to any ability of peaceful closure.
9. Counsel has been in contact with the AUSA handling this case who indicates the position of the office in these requests is to object.

WHEREFORE, it is respectfully requested that the Court issue a temporary release from custody from the Green County jail so that defendant's mother can pick her up at 9:00 a.m. to go to her grandfather's funeral and return her to the jail by 5:00 p.m. on Saturday, August 22, 2020.

/s/Donald R. Cooley  
Donald R. Cooley  
Missouri Bar No. 21172  
901 East St. Louis, Suite 1600  
Springfield, MO 65806  
(417) 831-3139

**CERTIFICATE OF SERVICE**

I hereby certify that the filing of this Motion on the CM/ECF computer system, which also delivers copies of the same to all counsel of record, was performed on this 19<sup>th</sup> day of August, 2020.

/s/Donald R. Cooley  
**Donald R. Cooley**